

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF SANDRA KELLY

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), and pursuant to a previously agreed-upon deposition place and date, Defendants Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Princeton Pharmaceutical Inc. will take the deposition upon oral examination of Sandra Kelly on November 17, 2021 at 10:00 a.m EST (9:00 a.m. CST) at the Auburn Marriott Opelika Resort & Spa at Grand National, 3700 Robert Trent Jones Trail, Opelika, Alabama 36801. Please take further notice that: the deposition will be stenographically recorded and videotaped, and will also be joinable via remote videoconference using audio-visual conference technology. Counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness, potentially remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and, if applicable, this identification must be legible on camera. The deposition shall continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Drew T. Dorner
Duane Morris LLP
505 9th Street N.W., Suite 1000
(202) 776-5291
dtdorner@duanemorris.com

Date: November 16, 2021

Respectfully submitted,

s/ Drew T. Dorner

Drew T. Dorner
Duane Morris LLP
505 9th Street N.W.
Suite 1000
Washington, DC 20004-2166
T: (202) 776-5291
dtdorner@duanemorris.com

*Attorney for Defendants Princeton
Pharmaceutical Inc., Zhejiang Huahai
Pharmaceutical Co., Ltd., Solco Healthcare
U.S., LLC, and Huahai U.S., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Sandra Kelly was served upon counsel for the parties via this Court's CM/ECF system, including the counsel of record listed below:

Layne Hilton
Kanner & Whiteley, L.L.C.
701 Camp Street
New Orleans, LA 70130
(504) 524-5777
l.hilton@kanner-law.com

s/ Drew T. Dorner
Drew T. Dorner